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Interim Co-Lead Consumer Class Counsel

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

MAXIMILLIAN KLEIN, *et al.*,

Plaintiffs,

v.

META PLATFORMS, INC.,

Defendant.

Consolidated Case No. 3:20-cv-08570-JD

The Hon. James Donato

**DECLARATION OF SHANA E.
SCARLETT REGARDING MEET AND
CONFER PURSUANT TO COURT
ORDER DATED MARCH 23, 2022**

This document relates to:

Klein v. Meta Platforms, Inc.
No. 20-cv-08570-JD

1 I, Shana E. Scarlett, declare as follows:

2 1. I am an attorney duly licensed to practice before all of the courts of the State of
3 California. I am a partner with the law firm of Hagens Berman Sobol Shapiro LLP, and Interim Co-
4 Lead Counsel for the Consumer Class in the above-titled action. I have personal knowledge of the
5 matters stated herein and, if called upon, I could and would competently testify thereto.

6 2. I make this declaration pursuant to the Court's March 23, 2022 Order (the "Order"),
7 Dkt. 263, directing lead counsel for the parties to meet and confer to resolve their disputes regarding
8 Plaintiffs' responses to Interrogatories Nos. 1-4 to Consumers and Interrogatory No. 1 to Advertisers
9 propounded by Defendant Meta Platforms, Inc. ("Facebook"), Dkts. 230, 259. I hereby attest to
10 compliance with the Court's Order.

11 3. On April 8, 2022, I met and conferred with Lead Counsel for Facebook Sonal N.
12 Mehta and David Gringer via video platform. Interim Co-Lead Counsel for the Advertiser Class
13 Yavar Bathaee and Kristen M. Anderson attended the conference in person, in New York. My co-
14 counsel, Stephen A. Swedlow, also attended the conference via video. The conference lasted four-
15 and-a-half hours.

16 4. At the time of the conference, due to a pre-existing commitment involving an ill
17 family member, I was not located within 100 miles of any other lead counsel and therefore
18 participated via videoconference.

19 5. After four-and-a-half hours at the mandated lead counsel conference, Consumer
20 Plaintiffs and Facebook were unable to resolve all of their disputes. The parties have exchanged
21 further correspondence, and held an additional conference on April 14, 2022 with lead counsel via
22 video. Both sides continue to work towards resolving the remaining issues in dispute but were unable
23 to do so at the time of this filing.

24 6. The parties have agreed, and propose to this Court, that they will file a stipulation or
25 joint letter addressing the remaining items in dispute no later than April 20, 2022.

1 I declare under penalty of perjury under the laws of the United States that the foregoing is
2 true and correct. Executed this 15th day of April, 2022, at Berkeley, California.

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4 s/ Shana E. Scarlett
5 SHANA E. SCARLETT
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